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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

NADIA ZAHMOUL, an individual,)	Case No.: 2:22-cv-00221-ABJ
)	
Plaintiff,)	
vs.)	
)	
BANK OF JACKSON HOLE, a division of)	
NBH Bank, d/b/a Bank of Jackson Hole,)	
)	
Defendant.)	
)	
)	
)	

**DEFENDANT'S MOTION TO RESTRICT ACCESS TO RESPONSE EXHIBITS F, G
AND H**

Defendant Bank of Jackson Hole, a division of NBH Bank, d/b/a Bank of Jackson Hole¹ ("Defendant" or "BOJH"), by and through undersigned counsel, moves this Court for an order permitting it to restrict access to Exhibits F, G, and H in support of its forthcoming Response in Opposition to Plaintiff's Revised Motion for Preliminary Injunction ("Response") when those Exhibits are filed. In support, BOJH states:

¹ Plaintiff named Bank of Jackson Hole, a division of NBH Bank, d/b/a Bank of Jackson Hole as the Defendant in this action, but the proper name is NBH Bank, d/b/a/ Bank of Jackson Hole, a division of NBH Bank.

CERTIFICATE OF CONFERRAL

1. Undersigned counsel conferred with counsel for Plaintiff Nadia Zahmoul via email on November 3, 2022, which Plaintiff's counsel acknowledged receipt of, and again on November 4, 2022. *See* Local Rule 7.1(b)(1)(A). However, as of this filing, Plaintiff's counsel has not provided Plaintiff's position regarding the relief requested in this motion.

ARGUMENT

2. This Court has ordered the parties to exchange documents in support of their respective positions by November 9, 2022. *See* ECF No. 13. Additionally, Local Rule 7.1(c)(1) provides that "supporting exhibits shall be filed with the [preliminary injunction] motion or brief . . . as a separate attachment."
3. Consistent with this Court's order and the Local Rules, and in support of its arguments raised in its Response, BOJH intends to attach—as Exhibits F, G, and H—the transaction histories for three accounts (Accounts x4797, x2458, and x8909) that it believes will be helpful to the Court in ruling on the preliminary injunction motion.
4. These histories, however, also contain non-public information regarding a nonparty's financial transactions, namely Karim Zahmoul.
5. For these reasons, BOJH believes that access to these Exhibits should be restricted by designating them as "non-public" when they are filed.

WHEREFORE, BOJH respectfully requests that the Court GRANT this Motion and permit it to restrict access to Exhibits F, G, and H when they are filed with the Response.

Respectfully submitted this 4th day of November, 2022.

/s/ Zane A. Gilmer

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 4, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system. Any other counsel of record will be served in accordance with the Federal Rules of Civil Procedure.

s/ Zane A. Gilmer
Zane A. Gilmer